

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BETTE JEAN MCDONALD,

Plaintiff,

v.

JOHN E. GILBERT, III,

Defendant.

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: 10-cv-06702 (DGL) (JWF)
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**PARTIES' STIPULATION REGARDING THE VIDEO DEPOSITION
TESTIMONY OF CORILYNN LORENZO**

WHEREAS, on July 12, 2012, Plaintiff Bette Jean McDonald offered in her case-in-chief in the jury trial of the above-captioned case video deposition testimony of Corilynn Lorenzo taken on June 20, 2012; and

WHEREAS, it is necessary to preserve a record of the deposition testimony played for the jury.

THEREFORE, THE PARTIES HEREBY STIPULATE for the record that the following portions of Ms. Lorenzo's deposition were played for the jury on July 12, 2012:

5:2-14	35:18-36:11	67:4-8
8:8-11	36:22-37:4	67:18-68:22
9:2-11:5	40:4-42:12	68:25-71:13
12:3-6	44:7-44:12	71:21-73:9
12:8-11	44:20-45:16	73:11-77:04
13:8-21	45:19-47:16	78:15-80:10
15:6-8	47:19-48:14	81:3-24
19:3-12	49:11-51:20	82:1-3
20:6-14	52:4-54:13	82:6-25
29:25-30:17	54:16-55:24	83:4-10
30:24-31:16	57:4-61:24	83:13-84:2
31:20-23	62:5-17	84:8-86:7
32:9-33:7	62:21-63:20	86:9-88:5
33:10-21	63:22-65:5	88:8-25
33:23-34:21	65:19-66:9	93:12- 93:20 ⁱ
35:3-15	66:12-23	94:19-96:03

96:8-98:6	111:6-111:13	130:3-10
98:9-99:9	111:21-112:11	131:23-132:4
99:18-101:6	112:23-113:6 ⁱⁱ	137:20-138:9
101:15-109:19	114:11-116:18	139:9-140:3
110:1-111:2	116:23-118:4	144:10-181:20.

The complete transcript of the deposition testimony of Corilynn Lorenzo taken on June 20, 2012 is attached hereto as Exhibit A. A transcript of only the above-designated testimony is attached hereto as Exhibit B. The parties also hereby stipulate that any reference in the deposition transcript to the term “key block” should actually be “keep lock.”

Dated: Rochester, New York
July 16, 2012

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ⁱ At which point Mr. Licata objected on the basis of hearsay, and Judge Feldman sustained his objection and instructed the jury to disregard this section of the testimony.

ⁱⁱ At which point Mr. Licata objected on the basis of hearsay, and Judge Feldman sustained his objection and instructed the jury to disregard the last question and answer.